

## Comments from 12/19/02 NM Meeting

1. I'm concerned about the interaction between EM and NNSA.
2. We are concerned about F-Canyon. Plans are to shut it down but we don't know what materials we have or a disposition path for it.
3. We share the concerns raised by the DNFSB in their November 8, 2002 letter. The dates for closure for the canyons are different; they are all over the place. Also what are the plans for replacing the canyons or a similar facility to do what the canyons do?
4. Have you looked at other ways of disposal? Look hard at onsite disposal. You already have a lot of Pu in the ground and no one is advocating digging it up. Could you put some fraction in the ground?
5. We should not accept regulations without question. We should evaluate them to see if they make sense. DOE has seen fit not to challenge state regulations. The first time DOE stood up to influence regulatory decisions was the Pu issue. You can affect decisions. You do a lot of things you don't need to do because of regulations.
6. It is important that you look at what other sites are doing.
7. Consider bundling equipment calibration standards together with other materials, e.g. SNF, to meet the spent fuel standard for Yucca Mountain.
8. Before you change rules/regulations for disposal, the public needs to be aware of the changes that are going to be proposed for more lenient criteria.
9. Changing the requirements to allow hazardous waste to be sent to WIPP is a major issue that requires careful evaluation. As of now, mixed waste can't go there but, if allowed, the need to process hazardous organic waste to stabilize it is eliminated.
10. Be careful of unproven technology – changes – consider what affects the public.
11. The 2006 philosophy is reasonable provided the decisions ensure the risk is actually reduced and there are no other unrecognizable risks that you don't identify today that will hurt you in the future.
12. DOE & SRS have assumed F-Canyon is going to cold, dark, and dry. If you continue on this path your decision is irrevocable. Cold, dark and dry is a final decision, and one without an end-state analysis. This is unacceptable to me that you leave it in this manner for 150 years.
13. Should we accelerate H-Canyon processing of material for 2006, recognizing NNSA will continue using it is of no significance to us. It is immaterial to us – it is all DOE. DOE has made it extremely difficult to see. You've got a product but you say it is someone else's. It is too difficult to understand the custody issue. It is not important as a stakeholder who owns it, take care of it.
14. Use F-Canyon as long as you can. The equipment is there.
15. In reference to Pu solutions to High Level Waste, all alternatives for disposal should be considered. Criticality is one concern but the value of material for recovery vs. disposal should be part of an honest evaluation.
16. Consider the value of Np before you decide on disposal.
17. For heavy water, again consider disposal vs. recovery. This is an asset that could be used, and you should seriously consider that before you dispose of it. It is a valuable and, even if you have to store it for 50 years, it could be done so at a low cost.
18. Depleted uranium is something that could be buried under proper conditions with regulatory

agreement.

19. This looks like a big list. I don't have a feeling of expediency.
20. I'm concerned about the receipt of plutonium and other materials that might create a political problem without parity issues. Look at "gimmies" to the state.
21. Look at early disposal vs. storage.
22. Don't be colored by the footprint. Reducing risk is for all people. If you just send it west, you may have helped people in SC but not the people out west.
23. This process is good but not the politics. Do the reasonable thing.
24. Some folks have the feeling that the site will be pristine. Other materials will still have to have something done to them. We aren't home free. NNSA's other missions will still have materials here.
25. The total DOE is not forthcoming. NNSA hides issues from the public and if DOE doesn't want to talk about it they move it to NNSA.